

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ESTATE OF DENNIS J. JOHNSON;
and JODY ANN FITTS, as Personal
Representative of the Estate of
Dennis J. Johnson,

Defendant.

Case No. 2:18-cv-00045-RSM

**ORDER GRANTING UNITED
STATES' MOTION FOR SUMMARY
JUDGMENT**

Upon consideration of the United States' Motion for Summary Judgment, and any response and reply thereto, the Court finds that for reasons stated in the United States' Motion, there is no genuine dispute of material fact, and the United States is entitled to judgment as a matter of law. Accordingly, the United States' Motion is hereby GRANTED.

The Clerk of the Court is directed to enter judgment against the Estate of Dennis J. Johnson and Jody Ann Fitts, as Personal Representative of the Estate of Dennis J. Johnson, as follows:

Judgment is hereby entered in favor of the United States and against the Estate of Dennis J. Johnson and Jody Ann Fitts, as Personal Representative of the Estate of Dennis J. Johnson, for

1 unpaid federal income tax liabilities for the years 2008 through 2012 in the amount of
2 \$498,706.40, plus interest and other statutory additions accruing from June 18, 2021 as provided
3 by law under 28 U.S.C. § 1961(c) and 26 U.S.C. §§ 6601, 6621, and 6622.

4 IT IS SO ORDERED.

5 DATED this 22nd day of July, 2021.

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9 RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

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12 Presented by:

13 DAVID A. HUBBERT
Acting Assistant Attorney General

14 /s/ Jennifer Y. Golden
15 JENNIFER Y. GOLDEN
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